

Jeff Tobias

From: GMDSS Instructor Staff [gmdss@mitags.org]
Sent: Monday, August 11, 2003 12:21 PM
To: Jeff Tobias, tmacguire@fcc.gov
Cc: Owen Anderson; Larry Pollock; Walt Megonigal
Subject: Petition for reconsideration and rulemaking

RECEIVED

AUG 14 2003

Federal Communications Commission
Office of the Secretary

11 Aug 03//1203//

Below is my recommendation for changes to the FCC's 47 CFR Parts 2, 13 and 80 (WT Docket 00-48; FCC 02-102; RM-9499)

This rule change neglected to address the problem with the use of DSC for routine calling and also the problem between ship board use and Coast Radio Stations.

Routine DSC Calling - The DSC's are a ships only common link to another ship anywhere in the world. While some GMDSS equipment allows for 2177 kHz to be inserted in memory, most ships do not have this capability or this frequency inserted, thereby inhibiting it's use. Plus, this is only useful when ships are close (within Medium Freq Range). Also, routine DSC calls only take 7 seconds, while a Distress DSC call takes 35 seconds. Since all GMDSS MF/HF equipment has a scanning watch receiver, the fact that a DSC Controller is busy, WILL NOT inhibit the reception of a Distress. Once the watch receiver hears a Distress and alarms, the GMDSS Operator is required to immediately cancel his routine call and shift his receiver to the corresponding voice frequency to listen for the Mayday. Without the capability to use these common frequencies for routine calling, we are severely limiting the ship's ability to communicate with other ships for business purposes worldwide.

Coast Radio Station - Under the Coast Station Watch section, there is a very serious disconnect between the Coast Radio Station and the Maritime industry. The Private and Public (less Coast Guard Stations) Coast Radio Stations, monitor DSC frequencies. These Coast Station DSC freqs are (1) Half Duplex and (2) are not the same as the six (seven is you include 2177

kHz) DSC freqs that the ships use. Ships CANNOT insert these Coast Station DSC freqs in their GMDSS equipment. The equipment will only allow for the Distress DSC freqs and (sometimes) 2177 kHz. Also, the ships equipment will not allow for the insertion of half duplex freqs. The equipment will only allow the six simplex MF/HF Distress DSC freqs.

Thanks in advance for your time and consideration on these matters.

If you have any questions, etc. you can contact me at rhneuma@worldnet.att.net, vice this address as I will be out of the office until mid/late October 2003.

Sincerely,
Ron Neuman
GMDSS Instructor
Maritime Institute of Technology and Graduate Studies
5700 Hammonds Ferry Rd
Linthicum Heights, Md. 21090
gmdss@mitags.org
443-989-3257

No. of Copies rec'd 0
List ABCDE